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Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**NOTICE OF ENTRY OF ORDER IN 2001
CHAPTER 11 CASE EXPUNGING
CERTAIN 2001 UTILITY EXCHANGE
CLAIMS**

1 **PLEASE TAKE NOTICE** that on January 29, 2019, PG&E Corporation and Pacific Gas and
2 Electric Company (the “**Utility**”), as debtors and reorganized debtors (collectively, the “**Debtors**” or the
3 “**Reorganized Debtors**,” as applicable) in the above-captioned chapter 11 cases (the “**2019 Chapter 11**
4 **Cases**”), each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code
5 with the United States Bankruptcy Court for the Northern District of California (San Francisco Division)
6 (the “**Bankruptcy Court**”).

7 **PLEASE TAKE FURTHER NOTICE** that by Order dated June 20, 2020 [Dkt. No. 8053] (the
8 “**Confirmation Order**”), the Bankruptcy Court confirmed the *Debtors’ and Shareholder Proponents’*
9 *Joint Chapter 11 Plan of Reorganization dated June 19, 2020* [Dkt. No. 8048] (the “**2020 Plan**”).¹ The
10 Effective Date of the 2020 Plan occurred on July 1, 2020. *See* Dkt. No. 8252.

11 **PLEASE TAKE FURTHER NOTICE** that the 2020 Plan classified various Claims against and
12 Interests in the Debtors, including “2001 Utility Exchange Claims” which included any Claim against
13 the Utility arising solely from (a) amounts due to the CAISO, PX, and/or various market participants
14 based on purchases or sales of electricity, capacity, or ancillary services by the Utility and other market
15 participants in markets operated by the CAISO and the PX that are subject to determination by FERC in
16 refund proceedings bearing FERC Docket Nos. EL00-95-000 and EL00-98-000 and related subdockets,
17 and (b) amounts due under any settlement agreements, allocation agreements, escrow agreements, letter
18 agreements, other written agreements, or court orders (including orders entered in the chapter 11 case
19 styled *In re California Power Exchange Corporation*, Case No. LA 01-16577 ES) that expressly relate
20 thereto.

21 **PLEASE TAKE FURTHER NOTICE** that section 4.29 of the 2020 Plan provides that “each
22 holder of a 2001 Utility Exchange Claim shall be entitled to pursue its Claim against the Reorganized
23 Utility as if the [2020] Chapter 11 Cases had not been commenced.”

24 **PLEASE TAKE FURTHER NOTICE** that on June 30, 2021, the Utility, as the reorganized
25 debtor in its prior chapter 11 case, *In re Pacific Gas and Electric Company*, Case No. 01-30923 DM,
26 also pending in the Bankruptcy Court (the “**2001 Chapter 11 Case**”), submitted an objection [2001
27 Chapter 11 Case Dkt. No. 16733] (the “**Objection**”) in the 2001 Chapter 11 Case to certain claims which
28 are classified in Class 6 under the confirmed chapter 11 plan in the 2001 Chapter 11 Case and are
29 classified as 2001 Utility Exchange Claims under the 2020 Plan, requesting that the Bankruptcy Court
30 disallow such claims to conform to the final order issued by the Federal Energy Regulatory Commission
31 (the “**FERC Order**”) concerning the amounts of such claims. The Objection did not seek to alter the
32 amounts payable to such claimants in accordance with the final FERC Order, but was merely intended
33 to avoid duplicative payment of such claims, and thus effectuate an orderly distribution of funds as
34 required by the final FERC Order.

35 **PLEASE TAKE FURTHER NOTICE** that on July 30, 2021, the Honorable Dennis Montali,
36 United States Bankruptcy Judge, issued an order in the 2001 Chapter 11 Case sustaining the Objection
37 [2001 Chapter 11 Case Dkt. No. 16736], provided that the Objection was deemed withdrawn with respect
38 to the claim of the City of Roseville bearing Claim No. 12386 in the 2001 Chapter 11 Case (the
39 “**Disallowance Order**”).

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¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the 2020 Plan.

1 **PLEASE TAKE FURTHER NOTICE** that the Disallowance Order is attached hereto as
2 **Exhibit 1.**

3 **PLEASE TAKE FURTHER NOTICE** that the Reorganized Debtors will adjust the claims
4 register in the 2019 Chapter 11 Cases as necessary to reflect the disposition of certain 2001 Utility
5 Exchange Claims consistent with the Disallowance Order in the 2001 Chapter 11 Case.

6 Dated: August 25, 2021

7 **WEIL, GOTSHAL & MANGES LLP**
8 **KELLER BENVENUTTI KIM LLP**

9 /s/ David A. Taylor

10 David A. Taylor

11 *Attorneys for Debtors and Reorganized Debtors*
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